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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14

15 PHILLIP BELL JR.; LORNA BARNES; and
16 ANTHONY BARNES.

17 Plaintiffs.

18 v.

19 SADDLEBACK VALLEY UNIFIED SCHOOL
20 DISTRICT; CALIFORNIA
21 INTERSCHOLASTIC FEDERATION; NEXT
22 LEVEL SPORTS & ACADEMICS; and ISAHIA
23 SANDOVAL; EDWARD WONG; TRICIA
24 OSBORNE; CHAD JOHNSON; STEVE
25 BRISCOE; SAREENA CHOW AND DOES 1-20
26 in their individual and official capacities.

27 Defendants.
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Case No. 4:24-cv-05545-JST

**JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

Date: October 14, 2025

Time: 2:00 pm

Judge: Honorable Jon S. Tigar

1 **1. Jurisdiction & Service**

2 Plaintiffs’ Second Amended Complaint (“SAC”) asserts federal question jurisdiction and
3 brings claims under 42 U.S.C. § 1983 against the school district, school district officials and the
4 California Interscholastic Federation (“CIF”) and a claim for “civil rights conspiracy” against all
5 current defendants. Plaintiffs also assert state law claims against defendants. Defendants have
6 pending motions to dismiss the claims in the SAC that were scheduled to be heard on September 11,
7 2025 and have been ordered submitted without argument.

8 Isaiah Sandoval and Sareena Chow have not been served. All other defendants have either
9 been served with the summons and complaint or stipulated to waive service of the summons and
10 complaint.

11 **2. Facts**

12 **Plaintiffs’ position**

13 Phillip III, a talented student-athlete and football player, was already on his way to a
14 successful college career under the shared custody of his father, Phillip Bell Jr., and his mother,
15 Samantha Barnes, in Sacramento, California. When Samantha allowed her husband, Sandoval, a
16 convicted felon, to become involved in Phillip III’s sports, tensions rose as Sandoval, in concert with
17 Briscoe, Next Level, and other shady adults, arranged for Phillip III to attend a high school in
18 Southern California, in violation of the shared custody agreement. Father, who had hoped Phillip III
19 would attend a Catholic school, was not consulted about this move, which promised financial
20 compensation and potential NIL (name, image, likeness) deals for Phillip III. The only individuals
21 who stood to benefit from his relocation to Southern California were Defendants.

22 Briscoe and Next Level orchestrated and facilitated the transfer of Phillip Bell III to a school
23 in Southern California and were compensated for brokering the deal. Following his relocation to Los
24 Angeles with Samantha and Sandoval, Phillip III’s well-being significantly deteriorated due to
25 Sandoval’s drug use, domestic violence, and neglectful living conditions, which included instances of
26 physical abuse. Distressed, Phillip III frequently called Father and his grandparents, Lorna and
27 Anthony, for help. Alarmed, Father and the grandparents filed a court petition to bring Phillip III
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1 back to Sacramento, which the court granted, ordering his return to his former Catholic high school
2 after his first semester in Los Angeles. Despite this order, Samantha and Sandoval, with the help of
3 Briscoe and Next Level, concealed Phillip III's location and disregarded the court's directive.

4 **Following Samantha's death under suspicious circumstances, the first thing Defendants**
5 **did was meet together — Johnson, Briscoe, and Sandoval — with Phillip III at an address**
6 **associated with Mission Viejo High School in Southern California to devise a plan to prevent**
7 **Father from accessing his son.** Although Father was already en route to the location at Phillip III's
8 request, he was denied entry to the home. **Johnson then had a recorded conversation with Father,**
9 **with a Saddleback administrator present, in which Johnson confirmed that the meeting with**
10 **Briscoe and Sandoval took place. That conversation was confirmed through transcripts**
11 **provided to this Court.**

12 After devising this plan, Defendants executed it by working collectively to keep Phillip III
13 away from his biological family. With the help of several defendants, Sandoval did retain control
14 over Phillip III and placed him to live with Serena Chow. District officials at Mission Viejo High
15 School, Sandoval Next Level and Briscoe, aware of the cease and desist letters and court orders, a
16 facilitated Phillip III's continued enrollment at Mission Viejo and took measures to hide him from
17 Father and his grandparents. Defendants, took Phillip III on out-of-state trips, and offered luxury
18 living situations, all designed to alienate him from his family and further their own interests. During
19 this same period, Defendants failed to provide Phillip III with the counseling and support he urgently
20 needed, despite being fully aware of his circumstances.

21 **CIF was aware of these facts and failed to investigate or train its employees to respond**
22 **properly. CIF has a pattern and practice of ignoring egregious violations of its own policies,**
23 **particularly at Mission Viejo High School. The conduct of Saddleback and its administrators**
24 **was so egregious that it demonstrates CIF's failure to properly train its staff and district**
25 **employees in the implementation and enforcement of CIF rules and regulations.** CIF failure to
26 act allowed Defendants to act with impunity and directly harmed Plaintiffs.

1 Plaintiffs claim that Defendants exploited Phillip III's athletic potential and benefited from it
2 at the cost of Plaintiffs. Defendants actions violated both legal and ethical obligations, causing
3 significant emotional distress for his biological family.

4 **Defendants' position**

5 Saddleback Valley Unified School District ("District") and District Defendants contend that
6 as a matter of law, District and individual District Defendants did not violate any of the alleged
7 Plaintiffs' rights as at all times Defendants exercised the authority imposed by the state with regard to
8 the student at Mission Viejo High School. Defendants also contend that District and District
9 Defendants did not owe or were in breach of any duty of care to Plaintiffs since the District's and
10 individual Defendants' statutory duty to ensure that students are safe does not extend to third parties
11 that are off campus, nor does it include a duty to protect the mental or emotional well-being of a
12 student's parents and grandparents. The entirety of District Defendant's position is fully briefed in the
13 pending motion to dismiss.

14 The CIF contends that no act or omission of the CIF and its employees was a cause of
15 Plaintiffs' alleged harm.

16 Defendants Steve Briscoe and Next Level Sports & Academics contend that Phillip III and his
17 mother made their own decisions about where to live and where Phillip III would play football.
18 Briscoe did not advise Phillip III to attend Mission Viejo or cause him to do so. Briscoe did not
19 receive any compensation for the advice and mentorship that he provided to Phillip III and his mother
20 and neither Briscoe nor Next Level has any contractual right to any compensation related to Phillip
21 III's decision about where to attend high school or college or to enter into any contract related to his
22 football career. Briscoe did not complete any forms related to Phillip III's enrollment at Mission
23 Viejo for either his junior or senior year. He also did not tell anyone that he was biologically related
24 to Phillip III. Briscoe and Next Level contend that no act or omission on their part was a cause of any
25 harm that Plaintiffs allege that they suffered.

26 The CIF contends that there is no plausible relationship between any acts or omissions of CIF
27 conduct and Plaintiffs' alleged harm.

1 **3. Legal Issues**

2 Issues include: whether the Second Amended Complaint plausibly states a claim for a
3 violation of Section 1983 against the school district, school district officials, or CIF; whether any
4 defendant owed Plaintiffs a duty of care; whether any defendant breached any such duty of care;
5 whether any defendant's conduct was the proximate cause of any injury to Plaintiffs; whether any
6 defendant's conduct met the required standard for outrageous conduct that would give rise to a claim
7 of emotional distress; whether Plaintiffs have adequately alleged extreme emotional distress; whether
8 Plaintiffs' unjust enrichment can be brought as a separate cause of action; whether the SAC
9 adequately alleges facts to plausibly show an agreement with a state actor to violate Plaintiffs' civil
10 rights or action in furtherance of any such alleged agreement; whether Phillip III's grandparents (who
11 did not have custody of him) have standing to bring any of their claims; and whether any claims for
12 injunctive relief are moot given Phillip III is no longer a minor.

13 Plaintiffs submit that many of the issues raised by Defendants have already been addressed by
14 this Court in connection with the first motion to dismiss. Specifically, claims regarding Saddleback
15 Valley Unified School District and its officials were adjudicated, and Plaintiffs have now
16 supplemented the operative complaint with additional facts and evidence that only recently came to
17 light after the commencement of litigation.

18 The Second Amended Complaint includes newly discovered factual evidence of a recorded
19 phone conversation, which was attached to the pleading and provided to this Court. That evidence
20 confirms that, on the day Samantha Barnes died, Briscoe was in Southern California and met with
21 Sandoval and Johnson to devise a plan to house Phillip III without his father present or his consent.
22 The evidence further shows that there was both an opportunity for these Defendants to meet and a
23 conversation had, and the results depict that their plan was in fact carried out: Father was prevented
24 from meeting with his son, denied access to him despite being en route at Phillip III's request, and
25 was never contacted by Defendants.

26 As a direct result of this newly uncovered evidence, Plaintiffs amended the complaint to add
27 Serena Chow, who physically housed Phillip III in furtherance of this plan and conspiracy. The
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1 Second Amended Complaint also includes additional factual allegations showing that CIF has long
2 been aware of similar issues and has repeatedly failed to take corrective action. Even if CIF did not
3 affirmatively participate in concealing Phillip III, the newly pled facts demonstrate conduct so
4 egregious and reckless that CIF's failure to act amounts to deliberate indifference and gives rise to
5 liability under Section 1983 and related claims.

6 Accordingly, the Second Amended Complaint plausibly states claims for civil rights
7 violations, negligence, and related causes of action against Defendants. Plaintiffs maintain that these
8 claims should proceed to discovery, as the new allegations directly address the deficiencies
9 Defendants rely upon in their motions and are supported by concrete evidence that has already been
10 submitted to the Court.

11 **4. Motions**

12 Defendants have filed motions to dismiss with regard to the Second Amended Complaint and
13 those motions were set to be heard on September 11, 2025, and have now been submitted without
14 argument. The parties anticipate that there will also be motions for summary judgment if the case
15 advances beyond the pleadings.

16 Plaintiffs believe that, following resolution of the pending motions to dismiss, they will file a
17 partial motion for summary judgment to narrow the issues for trial.

18 **5. Amendment of Pleadings**

19 Plaintiffs filed a Second Amended Complaint on July 1, 2025. No other amendments of the
20 pleadings are expected at this time.

21 **6. Evidence Preservation**

22 The parties have reviewed the Guidelines Relating to the Discovery of Electronically Stored
23 Information ("ESI Guidelines"). The parties have met and conferred pursuant to Federal Rule of
24 Civil Procedure 26(f). The parties are taking steps to preserve evidence and will continue to have
25 discussions regarding a plan for discovery in this action.

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The parties have not yet made initial disclosures and request that the time for making initial disclosures be extended until the pleadings in this matter are set.

8. Discovery

No discovery has occurred yet. The parties continue to discuss a proposed discovery plan. Plaintiffs respectfully respond that, given the current posture of this case, they request that the Court schedule a Case Management Conference at its earliest convenience for the purpose of entering a scheduling order so that discovery may proceed without further delay. Plaintiffs note that discovery has been stayed for over a year, which significantly prejudices their ability to develop the record. The prolonged delay increases the risk of evidence spoilage and witness memory loss, thereby biasing Plaintiffs and undermining their ability to fairly present their claims.

This prejudice is further compounded by the fact that it appears that Defendant Sandoval is in hiding, which limits Plaintiffs' ability to secure his testimony or obtain relevant evidence from him. Without discovery, Plaintiffs are placed at a substantial disadvantage and risk irreparable harm to their ability to prosecute this case.

9. Class Action

This is not a class action.

10. Related Cases

None.

11. Relief

Plaintiff seeks general monetary damages, special damages, punitive and exemplary damages, attorney's fees, and statutory damages as allowed by law.

12. Settlement and ADR

Based on the parties' discussions to date, the parties do not believe that settlement discussions would be fruitful in advance of the Court's ruling on the pending motions to dismiss and at least some preliminary discovery related to any claims that survive a motion to dismiss.

The parties do not currently believe the case is suitable for referral to arbitration or a special master.

The parties believe that the most consequential issues are raised in the motions to dismiss that were scheduled to be heard on September 11, 2025, and have been submitted without argument.

At this time, the case does not appear to be the type that could be handled under expedited trial procedures.

Defendants believe that the Court should wait to set a schedule for this matter until after the pleadings are set.

Plaintiffs respectfully oppose Defendants' request to further delay the setting of a schedule. This case has already been pending for over a year without discovery, and the continued absence of a scheduling order prejudices Plaintiffs. Each additional delay increases the risk of evidentiary spoilage, fading witness memories, and lost opportunities to obtain critical testimony.

Defendants’ proposal to wait until “after the pleadings are set” only compounds this harm. Plaintiffs have already filed a Second Amended Complaint supported by new factual evidence attached to and provided to the Court, including transcripts confirming Defendants’ coordinated efforts to deprive Phillip III of access to his father. Plaintiffs should not be forced to remain in procedural limbo while Defendants continue to press motions that could take months to resolve.

Plaintiffs and the District Defendants demand a jury trial. The Plaintiffs estimate that trial could last 5-7 days. The District Defendants estimate 10 days for any such trial. To the extent that any claims in this action need to be resolved at a trial, Defendants Steve Briscoe and Next Level believe that Plaintiffs' prior estimate of 3-5 days for any such trial will be more than adequate.

1 **18. Disclosure of Non-party Interested Entities or Persons**

2 The parties do not currently believe there is there is any conflict or interest (other than the
3 named parties) to be disclosed.

4 **19. Professional Conduct**

5 Counsel for all parties have reviewed the Guidelines for Professional Conduct for the
6 Northern District.

7 **20. Other**

8 None.
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1 Dated: October 7, 2025

Respectfully submitted,

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_____/s/ Kevin Calia
Kevin Calia